



September 26, 2007

David C. Carlson, Ph.D.  
Chief, NPDES Section  
California Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, Ca 95670-6114

**RE: Comments on AUGUST 27, 2007 DRAFT NPDES Permit for the City of Colfax**

Thank you for this opportunity to submit comments on the August 27, 2007 Revised Draft of the Proposed NPDES Permit for the City of Colfax Wastewater Treatment Plant.

We understand that the Board directed that further comments would be limited to the following issues:

1. Copper Effluent Limits
2. Nitrate Effluent Limits
3. Inflow and Infiltration issues as addressed in the proposed Cease and Desist Order
4. The requirement and schedule for lining the City's storage pond

Attached is a detailed table of comments concerning the Revised Permit language. Because the Public Hearing is limited to four specific items we have separated our comments into two categories.

The first are comments related to specific items to be discussed during the Public Hearing. The second list of comments is general and reflects clarifications we believe would be appropriate and points we want outlined in the record. If they are not addressed now, they may become problems in the future that will require amendment of the permit.

With respect to the remaining issues that are now before the Board, there appear to be two that continue to be major concerns to the City—the schedule for completion of the liner to the Storage Pond and the language with respect to I/I requirements in the proposed Cease and Desist Order (CDO). The City believes that the current language in the Permit and CDO with respect to these issues imposes unreasonable requirements that the City is not likely to be able to meet.